IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EDDYSTONE RAIL COMPANY, LLC,	
Plaintiff/Counter-Defendant,)
v.) No. 17-cv-00495-RK
BRIDGER LOGISTICS, LLC, JULIO RIOS, JEREMY GAMBOA, FERRELLGAS PARTNERS, L.P., and FERRELLGAS L.P. et al.)))
Defendants.)
BRIDGER LOGISTICS, LLC, FERRELLGAS PARTNERS, L.P., and FERRELLGAS, L.P.)))
Defendants/Counterclaimants))

JOINT PROPOSED SCHEDULING ORDER

Pursuant to the Court's Order dated April 30, 2020, the parties met and conferred but were unable to agree upon a joint proposed schedule. Set forth below is each side's proposed schedule.

Existing Schedule	ERC's Proposal	Defendants' Proposal
(Ordered April 14, 2020; Vacated April 30, 2020)		

Disclosure of Rule 26(a)(2) (A)-(C) Experts in Support of Claims and Counterclaims	May 11, 2020 (4 weeks after resolution of Motion to Enforce)	July 29, 2020 (4 weeks after July 1 report)	July 29, 2020 (4 weeks after July 1 report)		
Disclosure of Opposition Experts	N/A	August 26, 2020 (8 weeks after July 1 report)	August 26, 2020 (8 weeks after July 1 report)		
Completion of Fact Depositions	June 22, 2020 (10 weeks after resolution of Motion to Enforce)	September 9, 2020 (10 weeks from July 1 report)	September 23, 2020 (12 weeks from July 1)		
Expert Reports in Support of Claims and Counterclaims Due	July 13, 2020 (3 weeks after completion of fact depositions)	September 30, 2020 (3 weeks after completion of fact depositions)	October 14, 2020 (3 weeks after completion of fact depositions)		
Expert Reports in Opposition to Claims and Counterclaims Due	August 3, 2020 (3 weeks after initial expert reports)	October 21, 2020 (3 weeks after initial expert reports)	November 11, 2020 (4 weeks after initial expert reports)		
Rebuttal Expert Reports Due	August 24, 2020 (3 weeks after opposition expert reports)	November 11, 2020 (3 weeks after opposition reports)	December 9, 2020 (4 weeks after opposition reports, due to Thanksgiving)		

Completion of Expert Discovery	September 28, 2020 (5 weeks after rebuttal reports)	December 16, 2020 (5 weeks after rebuttal reports)	January 13, 2021 (5 weeks after rebuttal reports, due to Holidays)		
Potential Mediation / Settlement Negotiation	Report to Court by June 1, 2020 regarding whether the case has been settled		N/A		
Summary Judgment Motions Due	N/A	January 13, 2021 (4 weeks after end of expert depos)	February 10, 2021 (4 weeks after end of expert depos)		
Summary Judgment Oppositions Due	N/A	February 10, 2021 (4 weeks after motions)	March 10, 2021 (4 weeks after motions)		
Summary Judgment Replies Due	nt (3 weeks after		March 31, 2021 (3 weeks after oppositions)		
Final Pretrial Filings Due	N/A	April 21, 2021 (7 weeks after completion of SJ briefing)	6 weeks after court ruling on motions for summary judgment		
Trial	N/A	May 5-26, 2021 (2 weeks after final pretrial)	10 weeks after court ruling on motions for summary judgment		

Dated: July 1, 2020 Respectfully submitted,

/s/ Filiberto Agusti

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/s/ Jeremy A. Fielding

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CERTIFICATE OF SERVICE

I ce	ertify that the	foregoing w	as filed vi	a the Court	's ECF sy	stem on J	July 1, 20	020, th	nereby
serving all	counsel of re	ecord.							

/s/ Filiberto Agusti
Filiberto Agusti